## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

#### IN THE MATTER OF:

General Iron Industries, Inc. 1909 N. Clifton Avenue Chicago, IL 60614

# General Iron's Response to Request to Provide Information Pursuant to the Clean Air Act

#### **GENERAL OBJECTIONS**

General Iron makes the following general objections which are incorporated into each of responses below.

- 1. General Iron objects to the Information Requests to the extent they seek information unrelated to compliance with the Clean Air Act or regulations promulgated thereunder.
- 2. General Iron objects to the Information Requests to the extent they seek records from outside the time period for which the Clean Air Act requires records to be retained.
- 3. General Iron objects to the Information Request to the extent they seek information protected by the attorney/client and work product privileges.

### Responses

- 1. Provide all construction permits, operating permits and permit applications submitted, received or in use since July 1, 2010.
  - RESPONSE: Copies of the permits and permit applications requested in Paragraph 1 are attached. Jim Kallas of General Iron provided the documents.
- 2. Provide copies of the Operating Program, maintained pursuant to 35 Ill. Adm. Code 212.309, and all revisions, used at the facility since July 1, 2012.
  - RESPONSE: 35 Ill. Adm. Code 212.309 does not apply to General Iron. General Iron is a scrap recycling facility, which falls under SIC Code 5093. Therefore, under 35 Ill. Adm. Code 212.302, Section 212.309 does not apply. Notwithstanding, General Iron has prepared an Operating Program to document the measures it has implemented to control fugitive dust at the facility, a copy of which is attached. Jim Kallas provided the document.
- 3. Provides copies of all annual emissions reports submitted to the Illinois Environmental Protection Agency from January 1, 2012 to the present.
  - RESPONSE: Copies of the annual emissions reports requested in Paragraph 3 are attached. Jim Kallas provided the reports.

4. Provide in Microsoft Excel compatible format monthly records of shredder throughput (tons/month) since July 1, 2012. Separate throughput by total tons, light iron (ferrous), and non-ferrous, include amount of auto bodies shredded, in tons.

RESPONSE: A spreadsheet with the information requested in Paragraph 4 is attached. Jim Kallas prepared the spreadsheet.

5. Provide shredder operating hours per day for each day from July 1, 2012 to the present. If no operations were conducted, state why there were no operations.

RESPONSE: A spreadsheet with the information requested in Paragraph 5 is attached. Jim Kallas prepared the spreadsheet.

6. Provide facility documents discussing volatile organic compound (VOC) emissions from the shredder since July 1, 2010. Include emissions calculations, applicability studies and correspondence.

RESPONSE: General Iron does not have any documents responsive to Paragraph 6.

#### **CERTIFICATION**

I, Jim Kallas , certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

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